

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

UNITED STATES

Plaintiff,

v.

BERNARD KLEIN,

Defendant.

CRIMINAL NO. 20-062-WES-LDA

**DEFENDANT'S CONSENSUAL MOTION TO CONTINUE
RESTITUTION HEARING**

In the Judgment entered in this case on April 13, 2021, the Court deferred the determination of the amount of restitution to be imposed for a period of 30 days. The government then sought, without objection from the defendant, an additional 30 days, until June 27, 2021, for entry of an order of restitution, and then renewed its consensual motion to continue negotiations until July 16, 2021. The parties have continued to engage in good faith negotiations regarding restitution in the hopes of reaching an agreed upon amount for submission to the Court, or at the very least narrowing issues for litigation at a restitution hearing. The parties remain optimistic of reaching an agreement within the next several weeks and the defendant asks, with the government's consent, that the Court delay determination of the need for a restitution hearing until August 16, 2021.

Respectfully submitted,

/s/ James M. Trusty

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CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2021, I served the foregoing by electronically using the CMF/EMF system.

Respectfully submitted,

/s/ James M. Trusty

James M. Trusty

Counsel for Defendant Bernard Klein